

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW HAMPSHIRE**

Laurie Ortolano,

Plaintiff

v.

The City of Nashua, New Hampshire; et al.

Defendants

Civil Action No. 1:22-CV-00326

**Plaintiff Laurie Ortolano's Motion to Compel Production
of Audio/Video Files of Police Interviews**

Plaintiff, Laurie Ortolano, respectfully requests that the Court grant her Motion to Compel Production of Audio/Video files of police interviews.

As grounds for this motion, Mrs. Ortolano states that the remaining audio/video files will likely provide evidence of bias, support for her claims about witness's unreliability, witness demeanor, accuracy of the transcripts and proof that what began as an investigation into alleged wrongdoing in the Nashua Assessing Office shifted into further scrutiny into Mrs. Ortolano's motives for questioning City governmental actors' conduct.

Mrs. Ortolano is submitting a memorandum supporting these grounds. Though she requested that the City voluntarily turn over the audio/video files at issue, the City's written response was "'I will not be supplementing the discovery at this time in our case.'" Additionally, counsel for Mrs. Ortolano reached out to the City attempting to obtain its concurrence, yet the City "confirm[ed] that we do not concur."

Wherefore, Mrs. Ortolano respectfully requests that the Court compel the production she seeks.

Respectfully submitted,
Plaintiff, Laurie Ortolano,
By and through Counsel,

October 25, 2024

/s/ William Aivalikles
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CERTIFICATE OF SERVICE

I certify that on this 24th day of October 2024 I served a copy of this Motion to Compel on all parties of record using the ECF electronic filing system.

/s/ William Aivalikles
William Aivalikles